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July 3rd, 2025

VIA ECF

Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Doe v. Alexander et al 1:25-cv-02241-RA

Dear Judge Abrams,

Counsel for Plaintiff submits this request, pursuant to Your Honor's Individual Civil Rule 5(A)(iii), for leave to file an accompanying letter motion under seal. The letter motion describes counsel's efforts to serve Hana Bolous and explains the delay in filing the certificate of service for Defendant John Doe in response to the Court's June 27, 2025 Order.[Dkt No. 34].

Plaintiff seeks permission to file the accompanying letter motion under seal at the request of counsel for Defendant John Doe who has asked that his client's name not be made public until he has time to enter an appearance and file a motion to proceed anonymously. As described in the underlying letter motion, John Doe's attorney believes that his client has been mistakenly identified as John Doe and is not the person described in the Complaint. Undersigned counsel agreed to seek accommodation for John Doe's request in an abundance of caution given the highly sensitive nature of the allegations in the complaint.

Both counsel for Alexander Defendants do not oppose filing this letter motion under seal.

Respectfully submitted,

/s/ Lilian M. Timmermann

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cc:

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Application denied. The only reason Plaintiff gives for sealing the letter is to conceal Doe's identity. But the letter does not reveal Doe's name to begin with, nor does it appear to reveal any information that could be used to identify him. Plaintiff also gives no reason to seal the discussion about her efforts to serve Boulos. There is thus no basis to seal the letter in its entirety. To the extent Plaintiff believes that select portions of the letter are sensitive, she shall, no later than July 14, 2025, file a redacted version of the letter on the docket, along with an accompanying letter explaining why those redactions are justified under the standard set forth by *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006).

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
July 7, 2025